

# EXHIBIT F

Gary Bishop

July 27, 2005

Allentown, PA

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

**CERTIFIED COPY**

In Re: PHARMACEUTICAL :

INDUSTRY AVERAGE WHOLESAL:

PRICE LITIGATION :

: MDL DOCKET NO.

-----: CIVIL ACTION #

THIS DOCUMENT RELATES TO: : 01CV12257-PBS

:

ALL ACTIONS :

-----:

Oral deposition of GARY

BISHOP, taken pursuant to notice, at the Four  
Points Sheraton, 3400 Airport Road, Room 235,  
Allentown, Pennsylvania 18109, on Wednesday,  
July 27th, 2005, beginning at approximately  
8:00 a.m., before David Walsh, Registered  
Professional Reporter and Notary Public, there  
being present:

Henderson Legal Services  
(202) 220-4158

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1 in the second sentence which says, "using  
2 Links Machine through OTN and reorders not  
3 coming up exact and are concerned about losing  
4 money on reimbursements."

5 Could you go through that sentence and  
6 tell me what is meant by "using Links Machine  
7 through OTN", what does that mean?

8 A. OTN stands for Oncology Therapeutics  
9 Network and OTN is probably the largest  
10 provider of chemotherapeutic and supportive  
11 care products for medical oncology offices.  
12 Hence, the name Oncology Therapeutics Network.

13 And one of their technologies is called  
14 the Links Machine and the Links Machine is a  
15 dispenser of drugs that assists the individual  
16 office in their inventory.

17 So, for instance, if they have an  
18 Intron-A 50 million unit vial in their Links  
19 Machine when they use it, the Links Machine  
20 reorders that for them. However, it will also  
21 act as an inventory control system to make  
22 sure that the amount of drug dispensed from

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1 the machine is actually being used and that's  
2 the last part of that sentence about losing  
3 money was they were utilizing an amount of  
4 million units of Intron from their Links  
5 Machine, but were not able to actually  
6 dispense to the patient the same amount that  
7 was being issued from the Links Machine.

8 Q. And did you know why -- was that a  
9 problem or was there an error in either the  
10 machine or the information or do you recall  
11 what was the solution of that?

12 A. I do exactly. Kathy, who is the nurse  
13 that presented this to me in that office, was  
14 purchasing the 50 MIU or MU million unit vial,  
15 which comes with one ML of diluent and is  
16 meant to be a unit of use.

17 So, essentially she was buying the wrong  
18 vial size. She was trying to get like three  
19 different doses or two different doses at  
20 22 million units, as it turned out here, and  
21 they weren't -- with such low volume diluent,  
22 she was unable to pull the whole 50 million

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1 units. So, she would use two at 22 and say,  
2 well, why can't I get -- where are the  
3 additional six, for example?

4 And it just wasn't there. When you  
5 start splitting an ML into a syringe, she  
6 clearly had chosen the wrong vial size. She  
7 was uneducated in terms of what vial she  
8 should have been using.

9 Q. Okay. The next item, is that Dr.  
10 Sieber?

11 A. Correct.

12 Q. And that's a date detailed of  
13 January 9th, 2002?

14 A. Um-hmm.

15 Q. And there's a comment concerning, "big  
16 issue with profit margins as well".

17 Do you see that?

18 A. Yes, I do.

19 Q. What was the big issue with profit  
20 margins and how did you address that with this  
21 doctor?

22 A. As you read on then, you'll kind of see

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1 what I recommended. There is really nothing I  
2 could do. I recognized that he had an issue  
3 with what he considered to be margins on the  
4 drug. He was skeptical though as you look up  
5 above as the rebuttals to the O'Donnell paper  
6 based on numbers of patients and those  
7 consulted for cystectomy.

8 My sense is that he probably just had a  
9 preference to perform surgical cystectomy and  
10 wasn't a big fan of the treatment to begin  
11 with; however, there's nothing I could do in  
12 terms of margin. I wrote the word big because  
13 it seemed to be his number one objection and  
14 what I showed on the very last sentence, as  
15 you read, is that there was a company called  
16 Florida Infusion with trans specials to many  
17 of these physicians that were doing bladder  
18 installations and I simply directed them that  
19 purchasing the drug through Florida Infusion  
20 may actually save them money on their  
21 purchase.

22 Q. And how did you have information on

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1 Florida Infusion and any potential cost  
2 savings?

3 A. That's just public information. They  
4 would fax to the offices, for example, the  
5 dollar amounts of the vials that they were  
6 charging. It was kind of like going into a  
7 retail pharmacy and saying how much do you get  
8 for a pill of Claritin? I mean it was just  
9 public information.

10 Q. Would that information come through your  
11 product manager or from Schering-Plough in  
12 anyway?

13 A. No, it did not.

14 Q. Would you get any feedback from any  
15 managers or the Schering-Plough supervisors  
16 concerning the information that you provided  
17 to Dr. Sieber relative to cost savings and  
18 addressing issues of profit margins?

19 A. No, I did not.

20 Q. Now, as an oncology representative, who  
21 is your supervisor?

22 A. Now?

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1 Q. Yes.

2 A. David Peckman, P-E-C-K-M-A-N.

3 Q. And have you had other supervisors since  
4 2001?

5 A. One.

6 Q. Who?

7 A. Mark Manzo. He was my hiring manager.  
8 He hired me in oncology in October of '01.

9 Q. Do you ever get feedback from either  
10 your managers or any other supervisors in  
11 Schering-Plough relative to what you have  
12 placed in call notes?

13 A. No, very little. It would only be on a  
14 field contact if he happened to be with me in  
15 the car and we opened up the lap top and we  
16 looked at the call notes and I shared those  
17 with him. Otherwise, no, it is for us. It is  
18 really for us to establish the relationship  
19 that we have with the office, the platform to  
20 which we have established, and where we are  
21 going to go forward with it.

22 Q. Have you ever been instructed by your



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1 manager or any other supervisor at  
2 Schering-Plough to delete or destroy any of  
3 your call notes?

4 A. No, I have not.

5 Q. Have you ever been told by your managers  
6 of Schering-Plough to destroy marketing  
7 material?

8 A. No, I have not.

9 Q. Have you ever participated in the  
10 destruction of marketing material that you  
11 have used to detail Schering-Plough products?

12 A. No, I have not.

13 Q. Now, you referred a couple times to the  
14 O'Donnell data?

15 A. Correct.

16 Q. Does that have anything to do with  
17 pricing or profitability of any of the  
18 products?

19 A. None, whatsoever. It was strictly a  
20 protocol to treat a specific disease state, a  
21 specific urologic cancer, bladder cancer.

22 Q. In the physician administered drug

# **EXHIBIT G**

**FILED UNDER SEAL**

# **EXHIBIT H**

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# EXHIBIT I

Debra Kane 30(b)6

Kenilworth, New Jersey

June 23, 2005

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF MASSACHUSETTS  
3 MDL NO. 1456  
4 CIVIL ACTION: 01-CV-12257-PBS  
5 Judge Patti B. Saris

6 IN RE: PHARMACEUTICAL INDUSTRY: DEPOSITION OF:  
7 AVERAGE WHOLESALE PRICE :  
8 LITIGATION : DEBRA KANE

9 THIS DOCUMENT RELATES TO:  
10 ALL CLASS ACTIONS

11  
12  
13 C O M P U T E R I Z E D T R A N S C R I P T of  
14 the stenographic notes of the proceedings in the  
15 above-entitled matter as taken by and before  
16 MARY T. NOVAK, a Certified Shorthand Reporter and  
17 Notary Public of New Jersey, in the office of  
18 SCHERING-PLOUGH, 2000 Galloping Hill Road,  
19 Building K-6, Kenilworth, New Jersey on Thursday,  
20 June 23, 2005, commencing at twenty-five minutes  
21 after ten o'clock in the forenoon.  
22

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WORLDWIDE COURT REPORTING  
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Washington, D.C. 20005

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Kenilworth, New Jersey

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13 (Pages 46 to 49)

|  |  |
|--|--|
| <p>1 She'll explain the source of the lists I've given<br/>2 you for Number 5.<br/>3 You've agreed to accept Number 7, documents<br/>4 in lieu of testimony.<br/>5 MR. McNEELY: On all of the<br/>6 documents I understand that everything that -- my<br/>7 experience has been everything we practice is in<br/>8 good faith. I would reserve a final acceptance<br/>9 based upon an examination, reserve any rights if<br/>10 they were unsatisfactory, or if there's<br/>11 deficiencies in any of these paper productions, we<br/>12 reserve the right to come back and ask for either<br/>13 additional documents or a designated<br/>14 representative.<br/>15 MR. KAUFMAN: Understood. I'm not<br/>16 agreeing to your doing it but I understand that<br/>17 and I don't think you're precluded from doing that<br/>18 by accepting these documents.<br/>19 MR. McNEELY: I understand. I just<br/>20 want don't to give for the record that there's a<br/>21 blanket acceptance.<br/>22 MR. KAUFMAN: I understand that.</p> | <p>46<br/>1 tell me and if the process or procedure has<br/>2 changed historically, would you please give me a<br/>3 time reference?<br/>4 A. Sure. Historically, the procedures around<br/>5 establishing introductory pricing for products was<br/>6 actually very vague. It was not -- there were no<br/>7 really standard operating procedures around it.<br/>8 So I think that pricing could come about, and it<br/>9 was maybe an iterative process, let's say either<br/>10 from the top down or the bottom-up. The brand<br/>11 teams would have input into pricing as well as<br/>12 executive management. There wasn't really a lot<br/>13 of structure around the process. I could tell you<br/>14 that with our change in management, which took<br/>15 place in, I guess it was 2004.<br/>16 Q. April 2003?<br/>17 A. April 2003 and continued on through 2004.<br/>18 Just in terms of all our executive management team<br/>19 turning over there was an introduction to a<br/>20 process, RFC which stands for request for<br/>21 concurrence, which puts significant discipline<br/>22 around our establishment of the pricing as well as</p> |
| <p>47<br/>1 You haven't seen these documents before so you<br/>2 can't say whether they are what they purport to<br/>3 be.<br/>4 MR. McNEELY: I think we're at a<br/>5 meeting of the minds.<br/>6 MR. KAUFMAN: So it's Number 1,<br/>7 Number 4 and the source of the lists that were<br/>8 given as Number 5, and that's it.<br/>9 MR. McNEELY: Okay.<br/>10 Q. Miss Kane, I believe we're ready to<br/>11 talk to you again. With regard to areas of<br/>12 inquiry Number 1, and your attorney has described<br/>13 or designated the three physician administered<br/>14 drugs, and my questions, I'll start with the<br/>15 Intron-A.<br/>16 Can you tell me how the prices are<br/>17 established on Intron-A?<br/>18 A. I think anything that I could tell you<br/>19 establishing prices would be the same for any of<br/>20 the drugs. There's no unique difference between<br/>21 any of the products.<br/>22 Q. I thank you for that. Go ahead and</p>   | <p>48<br/>1 any discount or rebate strategies.<br/>2 Q. I am familiar with your testimony<br/>3 in your previous deposition and you described how<br/>4 AWP as well as the RFCs were both historically and<br/>5 since the new management began. You reviewed that<br/>6 testimony?<br/>7 A. Yes.<br/>8 Q. Do you have anything more to add to<br/>9 that testimony?<br/>10 A. I do not.<br/>11 Q. I don't want to just be duplicative<br/>12 in that area.<br/>13 A. I do not.<br/>14 MR. McNEELY: Now, with regard to<br/>15 the next item number 4. Is that correct?<br/>16 MR. KAUFMAN: Yes.<br/>17 Q. Communications oral or written with<br/>18 publishers or any of the following. List price<br/>19 AWP, net price, suggested wholesale price, WACO,<br/>20 any other communication with publishers.<br/>21 What information can you tell me about<br/>22 communications to publishers relative to any of</p>  |

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14 (Pages 50 to 53)

|   |  |
|---|--|
| <p style="text-align: right;">50</p> <p>1 those prices?</p> <p>2 A. We provide written communications to the</p> <p>3 third party pricing agencies with respect to</p> <p>4 pricing notifications, whether it's introductory</p> <p>5 pricing or list price changes.</p> <p>6 Q. And that would include AWP pricing?</p> <p>7 A. Historically it did include AWP. The</p> <p>8 company no longer reports AWP.</p> <p>9 Q. When did the company cease</p> <p>10 reporting AWP?</p> <p>11 A. I don't remember. I don't recall the exact</p> <p>12 date.</p> <p>13 Q. I'm not asking for the exact date,</p> <p>14 what year, if you can tell me?</p> <p>15 A. 2003, 2004.</p> <p>16 MR. KAUFMAN: I must say, Mr.</p> <p>17 McNeely, in that box there are documents</p> <p>18 illustrative as to her testimony as to Number 1.</p> <p>19 There's a product log for Intron-A, a document</p> <p>20 that describes the process for setting the price</p> <p>21 of Intron-A. And also some documents that relate</p> <p>22 to changes in price for drugs that have already</p>                 | <p style="text-align: right;">52</p> <p>1 prices were set by Schering-Plough. Is that</p> <p>2 correct?</p> <p>3 A. The net direct price was set by</p> <p>4 Schering-Plough and AWP was merely a calculation</p> <p>5 off of the net direct price. Based upon the net</p> <p>6 direct price.</p> <p>7 Q. What calculation was used by</p> <p>8 Schering-Plough to arrive at an AWP?</p> <p>9 MR. KAUFMAN: Objection. It's</p> <p>10 outside the scope of her designation.</p> <p>11 You may answer for yourself.</p> <p>12 A. Net direct price multiplied by 120 percent.</p> <p>13 MR. McNEELY: Now, if I recall your</p> <p>14 explanations earlier, there are no documents for</p> <p>15 item Number 2.</p> <p>16 MR. KAUFMAN: Yes. That's correct.</p> <p>17 I'm sorry. My earlier comments were confusing.</p> <p>18 Let me clarify my confused comments before.</p> <p>19 The pricing documents to which I referred</p> <p>20 are all within area of inquiry Number 1.</p> <p>21 Number 2, the company does not market or</p> <p>22 sell directly to physicians. Physicians do not</p>  |
| <p style="text-align: right;">51</p> <p>1 been launched. That's in a folder labeled number</p> <p>2 one.</p> <p>3 In Number 2, folder labeled number 2, there</p> <p>4 are also communications, written communications</p> <p>5 with pricing services that exemplify the</p> <p>6 description and I believe you will be able to see</p> <p>7 a change from an earlier time when AWP was</p> <p>8 reported, to a later time when AWP was not, which</p> <p>9 may give more indication of when the change</p> <p>10 actually occurred.</p> <p>11 Q. And in connection with the comments</p> <p>12 of your attorney, have you reviewed any of the</p> <p>13 documents that are going to be --</p> <p>14 MR. KAUFMAN: Thankfully, no.</p> <p>15 A. I have not.</p> <p>16 Q. For these introductory</p> <p>17 notifications to publishers, historically, they</p> <p>18 would include both AWP and a list price or net</p> <p>19 direct price. Is that correct?</p> <p>20 A. Yes.</p> <p>21 Q. And the AWP, and I'll just use net</p> <p>22 direct price, those were prices, both of those</p> | <p style="text-align: right;">53</p> <p>1 buy product from the company. So the company has</p> <p>2 no records of the prices paid by physicians for</p> <p>3 company products. That's not something the</p> <p>4 witness is designated to testify to but that's my</p> <p>5 representation to you as the spokesperson for the</p> <p>6 company in this setting. Okay.</p> <p>7 But there are no documents, it's impossible</p> <p>8 for anyone to identify them. There aren't any.</p> <p>9 Q. Miss Kane, is it your understanding</p> <p>10 that Schering-Plough or Warrick does not sell</p> <p>11 directly to physicians or physicians' clinics?</p> <p>12 MR. KAUFMAN: Objection. It's</p> <p>13 outside the scope of her designation.</p> <p>14 You may answer for yourself.</p> <p>15 A. We do not sell directly to physicians.</p> <p>16 Schering-Plough does not sell directly to</p> <p>17 physicians.</p> <p>18 MR. McNEELY: With regard to item</p> <p>19 Number 3, you're not designating her to respond to</p> <p>20 that topic?</p> <p>21 MR. KAUFMAN: That's correct. I've</p> <p>22 given you a list of materials that the sales</p> |

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15 (Pages 54 to 57)

1 management has told us are the materials that we  
2 would expect to have the salespeople keep but Miss  
3 Kane is not in that function. She can't testify  
4 to that. If, after looking at them, and after  
5 talking to other sales reps, you want someone in  
6 the company, some management in the company to say  
7 that that's the right list, we can provide that.  
8 But Miss Kane isn't the person.

9 Q. This is the list that was handed to  
10 me by Mr. Kaufman. Did you have anything to do  
11 with preparation of that list?

12 MR. KAUFMAN: Objection. It's  
13 outside the scope of her designation.

14 You may answer.

15 A. No. I did not.

16 Q. So that we know, the list will have  
17 a connection with this deposition, I'd like to  
18 have that marked as the next Exhibit Kane 002.

19 (A list of materials is received  
20 and marked as Exhibit Kane 002 for identification.)

21 (A recess is taken.)

22 Q. Now, with regard to item Number 5,

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1 designation June 16 notice number 2 and this  
2 refers to Albuterol and I am going to -- this is  
3 going to be marked 004.

4 Can you give me the source for that list?

5 A. Again, this would be IMS data.

6 Q. Again, did you prepare that list?

7 A. I did not.

8 Q. How do you know that it's IMS  
9 generated?

10 A. Again, IMS is the source that the company  
11 uses for information like this, purchase the data  
12 from IMS.

13 Q. Do you know who prepared these  
14 lists which is Exhibit Kane 003 and Exhibit Kane 004?

15 A. It is my understanding that Harvey  
16 Weintraub prepared the list.

17 (A list entitled Intron-A,  
18 Immunologic Interferons is received and marked as  
19 Exhibit Kane 003 for identification. A list entitled  
20 Albuterol, Beta Agonist Neb Sol is received and  
21 marked as Exhibit Kane 004 for identification.)

22 Q. With regard to item 7 --

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1 the identity and nature of the competitive drug  
2 with respect to each physician administered  
3 AWPID, which is now plaintiffs, identify some of  
4 these drugs or all of these drugs, and I  
5 understand you are going to -- this one is going  
6 to be marked. I've been given two lists. One is  
7 entitled June 16th notice number 5, 1 of 2. And  
8 it refers to Intron-A. And I'm going to have it  
9 marked as number 003 and ask you to look at that  
10 and if you can provide the source of that  
11 particular list?

12 A. This is taken from IMS data.

13 Q. Did you actually make that list?

14 A. I did not.

15 Q. How do you know that it's sourced  
16 with IMS?

17 A. All of the companies data, as it relates to  
18 products and competitive information, is IMS.

19 Q. And that would include  
20 Schering-Plough. Is that correct?

21 A. Yes.

22 Q. And the next list is handwritten

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1 MR. KAUFMAN: She's not been  
2 designated on that.

3 MR. McNEELY: You are on behalf of  
4 Schering-Plough, as their attorney, you are  
5 representing that there are documents in this box  
6 that are responsive to that?

7 MR. KAUFMAN: Correct.

8 MR. McNEELY: That would be the same  
9 with regard to 8, 9, 10?

10 MR. KAUFMAN: That's correct.

11 MR. McNEELY: And then we have to  
12 talk about item 11. And then with regard to the  
13 item 12 with the sales representatives, you  
14 earlier stated that that would be produced  
15 momentarily. Are we talking about this morning or  
16 this afternoon?

17 MR. KAUFMAN: I can't say. It's  
18 not I who is preparing it but it was supposed to  
19 have been prepared before now to give to you right  
20 now and I don't know why it hasn't been but it  
21 can't take very long to do. So I can't say it  
22 will be today, because I don't know, but it will

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# EXHIBIT J



Jerome A. Sherman    **HIGHLY CONFIDENTIAL**  
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1            1997. If you would take a look at that and  
2            tell me if that is something you received  
3            and whether you use that in connection with  
4            your duties as a national sales director  
5            for Warrick Pharmaceuticals.

6        A. (Witness examines document) This has to  
7            do more with advertising, promotional  
8            documents that would be going into  
9            advertising or used in a detail aid, FDA  
10           guides. I don't get involved in any of  
11           this.

12       Q. Have you ever received a copy of that  
13           document in the past?

14       A. No, I haven't.

15       Q. Are there any procedure or practice manuals  
16           other than what you've seen here that I've  
17           just shown you that directs the activities  
18           of the Warrick Pharmaceuticals national  
19           sales directors?

20                    MR. CHRISTOFFERSON: Objection. You  
21            may answer.

22       A. I'm not sure whether we haven't had a

Jerome A. Sherman    **HIGHLY CONFIDENTIAL**  
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1        revision to the Warrick practices, like I  
2        said, two, three years ago.

3    Q.    Is that the manual that you referred to that  
4        you rarely resort to?

5    A.    I mean, I have been with Schering for a  
6        number of years and policies do change, and  
7        I'm aware of the policies as they change  
8        and live by those policy changes. So when a  
9        policy change occurs, I know about it and  
10       follow those rules.

11   Q.    How are you notified of changes in policy?

12   A.    I get documents from home office.

13   Q.    Do you preserve those documents, notices  
14        from the home office relative to changes in  
15        policy?

16   A.    I don't have them. Yes, I suppose we do.

17   Q.    When was the last time you received that  
18        type of document, a notice of a change in  
19        policy?

20   A.    It was a few years ago when we got a change  
21        in entertainment, what we could spend on  
22        entertainment or what we could spend on

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1            meals on the road, things of that nature,  
2            and this is Warrick I'm talking about.

3        Q.    Do you have a folder or file where you  
4            have maintained those notices of change in  
5            policy?

6        A.    No, I don't.

7        Q.    The price change notices that we have looked  
8            at and marked as exhibits in this case, in  
9            this deposition, that is a type of notice  
10           that you send out on a regular basis; is  
11           that not correct?

12                    MR. CHRISTOFFERSON:    Objection.    You  
13            may answer.

14        A.    When a price change occurs, certainly.

15        Q.    And would it be fair to say that that happens  
16            many times a year where you send out that  
17            type of notice to all your accounts?

18        A.    Only to those accounts that require a price  
19            change.

20        Q.    And all of those notices, as far as you  
21            can testify to, would include the price as  
22            well as the new price as well as the AWP;

Jerome A. Sherman    **HIGHLY CONFIDENTIAL**  
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1            is that correct?

2                            MR. CHRISTOFFERSON:    Objection.    You  
3            may answer.

4    A.    I haven't seen the AWP on those documents  
5            for very long time.

6    Q.    When was the last time that you saw a  
7            document notifying a price change where  
8            AWP was not listed?

9    A.    Repeat that, please.

10   Q.    You said that you hadn't seen AWP on a  
11            price change document in a very long time.  
12            When did you start sending out price change  
13            notices without AWP on it?

14   A.    I don't remember when that occurred.

15                            (Exhibit Sherman 030 marked for  
16            identification.)

17   Q.    Mr. Sherman, you've been handed a document  
18            that has been marked Exhibit Sherman 030?

19   A.    Yes.

20   Q.    And this is a price change notification  
21            from you to one of your accounts; is that  
22            correct?

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1    A.    Yes.

2    Q.    And the effective date on this price change  
3        is, appears to be May 8 of 2000.    Is that  
4        how you read this document?

5    A.    Yes.

6    Q.    So as recent as, or at least the year 2000,  
7        AWP was still being reported or shown  
8        on price change notifications; is that  
9        correct?

10                    MR. CHRISTOFFERSON:  Objection.  You  
11        may answer.

12   A.    Yes.

13   Q.    With regard to the spread, the difference  
14        between the AWP and the direct price as  
15        shown on this, is it not correct that as  
16        the AWP -- strike that.

17                    Would you agree that where the AWP  
18        remains the same and the direct price is  
19        decreased, that there's an increase in the  
20        spread?

21                    MR. CHRISTOFFERSON:  Objection.  You  
22        may answer.

Jerome A. Sherman    **HIGHLY CONFIDENTIAL**  
Boston, MA

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1    A.    Yes.

2    Q.    And also, if the direct price is subject to  
3            any rebates that would result in a decreased  
4            price per unit, that would also result in a  
5            spread; is that correct?

6                    MR. CHRISTOFFERSON:  Objection.  You  
7            may answer.

8    A.    Yes.

9    Q.    Now, having looked at this last exhibit,  
10           which is in May of -- apparently, effective  
11           date of the price change in May of 2000,  
12           does that help or refresh your memory in  
13           any way as to when AWP was discontinued  
14           as an item on a price change notice?

15   A.    No, it doesn't.  It was, obviously,  
16           subsequent to this time frame.

17   Q.    Mr. Sherman, are you familiar with a term,  
18           "nominal pricing," for purposes of either  
19           contracts or for selling product on behalf  
20           of Warrick Pharmaceuticals?

21   A.    I've heard the term.

22   Q.    What is your understanding of nominal